

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In Re:

Craig Staggs

Case No: **6:13-bk-12427**

Debtor

MOTION TO EXTEND STAY

COMES NOW, the Debtor, by and through his undersigned attorney, and moves this Court to grant an extension of the automatic stay under 11 U.S.C. Section 362(c)(3) and as grounds, states as follows:

1. The debtor(s) filed this Chapter 13 case in order to reorganize debtor(s) finances.
2. The debtor(s) previous Chapter 13 case was dismissed without an injunction.
3. The debtor(s) need the benefit of the automatic stay in order to effectively reorganize all finances.

WHEREFORE, debtor(s) request the entry of an order extending the automatic stay throughout the course of the Chapter 13 case and for such other and further relief as this Court deems just and appropriate.

Dated this 11th day of October, 2013.

/s/ Patrick J. Thompson
Patrick J. Thompson, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Motion for Mortgage Modification has been sent, via ECF, to all interested parties on the debtor's matrix (attached) on this 11th day of October, 2013.

Respectfully Submitted,

/s/ Patrick J. Thompson, Esq.
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